

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

**FIRST INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR,
LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO
LAWRENCE FITZPATRICK, LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS
FOR THE PERIOD FROM JULY 18, 2017 THROUGH NOVEMBER 30, 2017²**

| | |
|--|--|
| Name of Applicant: | Young Conaway Stargatt & Taylor, LLP |
| Authorized to Provide Professional Services to: | Lawrence Fitzpatrick, Legal Representative for Future Claimants |
| Date of Retention: | October 4, 2017, effective <i>nunc pro tunc</i> to July 18, 2017 [Docket No. 287] |
| Period for which compensation and Reimbursement is sought: | July 18, 2017 through November 30, 2017 |
| Amount of Compensation Sought as Actual, Reasonable and Necessary: | \$29,204.00 |
| Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary: | \$406.93 |
| This is an: | <u> x </u> interim <u> </u> final application |

¹ The last four digits of the Debtor's federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants' Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor ("YCST"). YCST's next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the "Interim Compensation Order") which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

| <u>Date Filed; Docket No.</u> | <u>Period Covered</u> | <u>Requested Fees/Expenses</u> | <u>Order Approving Interim Application</u> | <u>Amount Approved and/or Paid</u> |
|--|----------------------------------|---|---|---|
| n/a | n/a | n/a | n/a | n/a |

**This is the first interim fee application of Young Conaway Stargatt
& Taylor, LLP. No prior applications have been filed.**

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

**FIRST INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO LAWRENCE
FITZPATRICK, LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS
FOR THE PERIOD FROM JULY 18, 2017 THROUGH NOVEMBER 30, 2017²**

Young Conaway Stargatt & Taylor, LLP (“YCST” or the “Applicant”), counsel to Lawrence Fitzpatrick, the legal representative for future claimants (the “Future Claimants’ Representative” or the “FCR”) in the chapter 11 case commenced by Sepco Corporation (“Sepco” or the “Debtor”), files this First Interim Application (the “Application”) of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period July 18, 2017 through November 30, 2017³ (the “Interim Period”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s *Agreed Order Granting Motion for an*

¹ The last four digits of the Debtor’s federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants’ Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor (“YCST”). YCST’s next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the “Interim Compensation Order”) which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

³ See Footnote 2.

Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professional Pursuant to Section 105(a) and 331 of the Bankruptcy Code (the “Interim Compensation Order”) entered September 2, 2016 [Docket No. 149].

By this Application, YCST hereby moves this Court for an order awarding the Applicant reasonable compensation for the Interim Period for professional legal services rendered in the amount of \$29,204.00 and reimbursement for actual and necessary expenses incurred in the amount of \$406.93, for a total of \$29,610.93. In support of this Application, YCST states as follows:

JURISDICTION AND STATUTORY BASIS FOR RELIEF

1. The Court has jurisdiction over the Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory basis for the relief requested herein is §§ 105(a) 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code.

BACKGROUND

3. On January 14, 2016 (the “Petition Date”), the Debtor filed a voluntary petition in this Court for relief under chapter 11 of the Bankruptcy Code.

4. From the Petition Date through the date of this First Interim Application, the Debtor has continued to operate its business and manage its property as a debtor-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

5. On September 13, 2017, Lawrence Fitzpatrick filed and served his *Application for Order Authorizing the Future Claimants’ Representative to Retain and Employ Young Conaway*

Stargatt & Taylor, LLP as His Attorneys Nunc Pro Tunc to July 18, 2017 [Docket No. 267]. On October 4, 2017, the Court entered the *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants' Representative* (the "Retention Order") [Docket No. 287].

RELIEF REQUESTED

6. By this First Interim Application, the Applicant seeks interim allowance of \$29,204.00 in fees for services rendered during the Interim Period and reimbursement of \$406.93 for reasonable and necessary expenses incurred during the Interim Period, for a total of \$29,610.93.

7. The Applicant has received no promises for payment from any third party for services rendered during the Interim Period in connection with the case. There exists no agreement or understanding between Applicant and any other person for the sharing of any compensation to be received for services rendered by the Applicant in the case.

8. All services for which compensation is requested by the Applicant pursuant to this Application were performed for or on behalf of the FCR in this case.

SUMMARY OF SERVICES RENDERED AND EXPENSES INCURRED

9. During the Interim Period, the Applicant spent 57.70 hours of attorney and paralegal time in connection with this case resulting in fees totaling \$29,204.00. Attached hereto as **Exhibits A-1 through A-3** are detailed descriptions of the services performed and expenses incurred by YCST during the Interim Period.

10. The Applicant has divided the services provided into the following categories: (a) Case Administration; (b) Court Hearings; (c) Use, Sale or Lease of Property (363 issues); (d) Other Adversary Proceedings; (e) Plan and Disclosure Statement; (f) Asset Analysis; (g)

Retention of Professionals/Fee Issues; (h) Fee Application Preparation and (i) Travel. These categories are more fully described and discussed below. The following is a summary of services that the Applicant performed during the Interim Period:

(a) *Case Administration (Task Code B001)* – During the Interim Period, the Applicant spent time downloading and circulating to the FCR and his counsel recently filed pleadings from the Court docket to keep them informed of case developments. Time was also spent conferring with the client and other professionals regarding due diligence issues and case status. The Applicant expended 1.90 hours totaling \$675.50 in fees for this category of services rendered.

(b) *Court Hearings (Task Code B002)* – During the Interim Period, the Applicant spent time participating in a telephonic hearing and status conference on November 7, 2017. The Applicant expended 1.00 hours totaling \$704.00 in fees for this category of services rendered.

(c) *Use, Sale or Lease of Property (363 issues)* – During the Interim Period, the Applicant spent time reviewing and analyzing the draft motion to approve the Hartford settlement agreement and corresponding with other professionals on this matter. The Applicant expended 3.90 hours totaling \$2,350.00 in fees for this category of services rendered.

(d) *Other Adversary Proceedings (Task Code B011)* – During the Interim Period, the Applicant spent time reviewing, analyzing, and commenting on proposed revisions to the protective order to include the FCR within the scope of the order and a motion to approve those changes. The Applicant expended 2.20 hours totaling \$1,189.50 in fees for this category of services rendered.

(e) *Plan and Disclosure Statement (Task Code B012)* – During the Interim Period, the Applicant spent time working and corresponding with other professionals regarding plan

negotiations. The Applicant expended 2.20 hours totaling \$1,751.00 in fees for this category of services rendered.

(f) *Asset Analysis (Task Code B016)* – During the Interim Period, the Applicant spent time reviewing and analyzing insurance issues and reviewing and commenting on the proposed Harford Settlement agreement and a draft motion seeking court approval of that agreement. Additional time was spent reviewing the draft motion to establish a Qualified Settlement Fund to hold the proceeds of that settlement agreement. The Applicant expended 8.90 hours totaling \$4,338.50 in fees for this category of services rendered.

(g) *Retention of Professionals/Fee Issues (Task Code B017)* – During the Interim Period, the Applicant spent time attending to issues regarding the appointment of the FCR, the FCR's insurance coverage, and preparing and executing YCST's retention application. The Applicant expended 31.80 hours totaling \$15,592.00 in fees for this category of services rendered.

(h) *Fee Application Preparation (Task Code B018)* – During the Interim Period, the Applicant spent time reviewing and revising fee statements and drafting the first interim fee application. The Applicant expended 4.30 hours totaling \$1,373.50 in fees for this category of services rendered.

(i) *Travel (Task Code B019)* – During the Interim Period, the Applicant traveled to and from Washington, DC to attend a meeting with Committee counsel regarding the Debtor's asbestos insurance and Plan formulation. Time expended in this category was billed at half the normal rate. The Applicant expended 1.50 hours totaling \$1,230.00 in fees for this category of services rendered.

11. As set forth above, the Applicant spent a total of 57.70 hours and incurred fees of \$29,204.00 for the services provided during the Interim Period. A Cumulative Compensation Summary by project category and Cumulative Expense summary are set forth and attached as **Exhibit B**. The totals by attorney and paralegal are as follows:

| <u>Professional</u> | <u>Current Hourly Billing Rate</u> | <u>Total Billed Hours for the Period</u> | <u>Total Compensation for the Period</u> | <u>Total Billed Hours from the Petition Date</u> | <u>Total Compensation from the Petition Date</u> |
|----------------------------------|---|---|---|---|---|
| Edwin J. Harron, Partner | \$820.00 | 9.60 | \$7,872.00 | 9.60 | \$7,872.00 |
| Sharon M. Zieg, Partner | \$695.00 | 1.60 | \$1,112.00 | 1.60 | \$1,112.00 |
| Sara Beth A.R. Kohut, Counsel | \$555.00 | 29.10 | \$15,873.00 | 29.10 | \$15,873.00 |
| Jordan E. Sazant, Associate | \$285.00 | 3.80 | \$1,083.00 | 3.80 | \$1,083.00 |
| Casey Cathcart, Paralegal | \$240.00 | 8.80 | \$2,112.00 | 8.80 | \$2,112.00 |
| Lisa Eden, Paralegal | \$240.00 | 4.80 | \$1,152.00 | 4.80 | \$1,152.00 |
| TOTAL | | 57.70 | \$29,204.00 | 57.70 | \$29,204.00 |

12. YCST requests reimbursement as follows for its actual and necessary expenses incurred during the Interim Period totaling \$406.93:

| <u>Expense Category</u> | <u>Total Expenses for the Period</u> | <u>Total Expenses from the Petition Date</u> |
|--------------------------------|---|---|
| Air/Rail Travel | \$267.00 | \$267.00 |
| Car/Bus/Subway Travel | \$35.87 | \$35.87 |
| Certified Court Documents | \$0.00 | \$0.00 |
| Computerized Legal Research | \$0.00 | \$0.00 |
| Docket Retrieval/Search | \$47.50 | \$47.50 |
| Federal Express | \$15.26 | \$15.26 |
| Hotel/Lodging | \$0.00 | \$0.00 |
| Miscellaneous | \$0.00 | \$0.00 |
| Mileage | \$0.00 | \$0.00 |
| Parking | \$11.00 | \$11.00 |

| | | |
|-----------------------------------|-----------------|-----------------|
| Postage | \$8.20 | \$8.20 |
| Reproduction Charges | \$22.10 | \$22.10 |
| Teleconference / Video Conference | \$0.00 | \$0.00 |
| Travel Meals | \$0.00 | \$0.00 |
| Working Meals | \$0.00 | \$0.00 |
| TOTAL | \$406.93 | \$406.93 |

Attached hereto as **Exhibits C-1 through C-3** are a copy of the Applicant's expenses, as well as all receipts for reimbursement of expenditures exceeding \$25.00.

LEGAL STANDARD FOR AWARDING COMPENSATION

13. Under section 330(a)(1) of the Bankruptcy Code, the Court may award reasonable compensation for actual, necessary services rendered by professionals employed by the Committee, including attorneys and paralegals employed by such attorneys based on the nature, extent, and value of the services rendered; time spent on such services; and the cost of comparable services other than in a bankruptcy case. The Court may also award reimbursement for actual, necessary expenses. *Id.*

14. Section 330(a)(3) of the Bankruptcy Code provides:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title

15. The Applicant has endeavored to represent the FCR in the most expeditious and economical manner possible. Further, the professionals at YCST have coordinated their activities with co-counsel to avoid duplication of effort on behalf of the FCR in the case whenever possible.

CONCLUSION

16. As previously stated, no agreement or understanding exists between the Applicant and any other person for sharing of any compensation to be received for professional services rendered or to be rendered in connection with this case.

17. No prior application has been made in this or any other Court for the relief requested herein for the interim period of July 18, 2017 through November 30, 2017⁴.

18. The Certification of Edwin J. Harron is attached hereto as **Exhibit D**.

Continued on Next Page

⁴ See Footnote 2.

WHEREFORE, for the reasons set forth herein, YCST respectfully requests: (i) interim allowance of compensation in the amount of \$29,204.00 for professional services rendered and \$406.93 as reimbursement for actual and necessary expenses YCST incurred during the First Interim Fee Period pursuant to Section 330 of the Bankruptcy Code; (ii) that the allowance of such compensation be without prejudice to YCST's right to seek additional compensation for services rendered and expenses incurred during the First Interim Fee Period that were not processed at the time of this Application; and (iii) that the Court grant such other and further relief as is just and proper.

Dated: December 21, 2017

BLACK, McCUSKEY, SOUERS & ARBAUGH, LPA

/s/ Joel K. Dayton

Joel K. Dayton (#0015804)
220 Market Avenue South, Suite 1000
Canton, OH 44702
Telephone: 330-456-8341
Facsimile: 330-456-5756
Email: jdayton@bmsa.com

- and -

Edwin J. Harron (Delaware Bar No. 3396)
Sara Beth A.R. Kohut (Delaware Bar No. 4137)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: eharron@ycst.com
skohut@ycst.com

Counsel to the Future Claimants' Representative

EXHIBIT A-1

INVOICE FOR JULY 18, 2017 – SEPTEMBER 30, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

(302) 571-6600
(800) 253-2234 (DE ONLY)

RODNEY SQUARE
1000 NORTH KING STREET
WILMINGTON, DELAWARE 19801

(302) 571-1253 FAX
www.ycst.com

P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

TAX I.D. No. 51-0082644

TO:

10/12/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40406967

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

| | | |
|----------------------|----|-------------------------|
| Total Fees | \$ | 14,681.00 |
| Total Expenses | | <u>51.70</u> |
| Total | \$ | <u><u>14,732.70</u></u> |

01:22446865.1 WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. **076321.1001** AND SEND TO THE ATTENTION
OF **ACCOUNTING DEPT.**

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

| <u>TASK CODE</u> | <u>TASK DESCRIPTION</u> | <u>TOTAL HOURS</u> | <u>TOTAL AMOUNT</u> |
|----------------------|---------------------------------------|------------------------|-------------------------|
| B001 | Case Administration | 0.70 | 257.50 |
| B017 | Retention of Professionals/Fee Issues | 27.40 | 13,825.00 |
| B018 | Fee Application Preparation | 2.10 | 598.50 |
| Totals | | 30.20 | \$ 14,681.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

| Task B001 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|----------------------------|-----------|--------------|------|---------------|----|--------------|
| Case Administration | | <u>Hours</u> | | <u>Rate</u> | | |
| Casey Cathcart | Paralegal | 0.50 | x \$ | 240.00 | = | 120.00 |
| Edwin J. Harron | Partner | 0.10 | x \$ | 820.00 | = | 82.00 |
| Sara Beth A.R. Kohut | Counsel | 0.10 | x \$ | 555.00 | = | 55.50 |
| Totals: | | 0.70 | | | \$ | 257.50 |

| Task B017 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|--|-----------|--------------|------|---------------|----|--------------|
| Retention of Professionals/Fee Issues | | <u>Hours</u> | | <u>Rate</u> | | |
| Casey Cathcart | Paralegal | 5.80 | x \$ | 240.00 | = | 1,392.00 |
| Edwin J. Harron | Partner | 2.70 | x \$ | 820.00 | = | 2,214.00 |
| Lisa Eden | Paralegal | 0.20 | x \$ | 240.00 | = | 48.00 |
| Sara Beth A.R. Kohut | Counsel | 0.50 | x \$ | 222.00 | = | 111.00 |
| Sara Beth A.R. Kohut | Counsel | 0.50 | x \$ | 333.00 | = | 166.50 |
| Sara Beth A.R. Kohut | Counsel | 17.20 | x \$ | 555.00 | = | 9,546.00 |
| Sharon M. Zieg | Partner | 0.50 | x \$ | 695.00 | = | 347.50 |
| Totals: | | 27.40 | | | \$ | 13,825.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

| Task B018 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|------------------------------------|-----------|--------------|------|---------------|----|--------------|
| Fee Application Preparation | | <u>Hours</u> | | <u>Rate</u> | | |
| Lisa Eden | Paralegal | 1.80 | x \$ | 240.00 | = | 432.00 |
| Sara Beth A.R. Kohut | Counsel | 0.30 | x \$ | 555.00 | = | 166.50 |
| Totals: | | 2.10 | | | \$ | 598.50 |
| Aggregate Total: | | 30.20 | | | \$ | 14,681.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

| | | <u>Total Hours</u> | | <u>Hourly Rate</u> | | <u>Total</u> |
|--------|-------------------------------|------------------------|----|------------------------|----|--------------|
| EHARR | Edwin J. Harron, Partner | 2.80 | \$ | 820.00 | = | 2,296.00 |
| SZIEG | Sharon M. Zieg, Partner | 0.50 | \$ | 695.00 | = | 347.50 |
| SKOHU | Sara Beth A.R. Kohut, Counsel | 17.60 | \$ | 555.00 | = | 9,768.00 |
| SKOHU | Sara Beth A.R. Kohut, Counsel | 0.50 | \$ | 333.00 | = | 166.50 |
| CCATH | Casey Cathcart, Paralegal | 6.30 | \$ | 240.00 | = | 1,512.00 |
| LEDEN | Lisa Eden, Paralegal | 2.00 | \$ | 240.00 | = | 480.00 |
| SKOHU | Sara Beth A.R. Kohut, Counsel | 0.50 | \$ | 222.00 | = | 111.00 |
| Total: | | 30.20 | | | \$ | 14,681.00 |

TIME DETAIL GROUPED BY TASK CODE

| Date | Description | Attorney | Task Code | Time |
|-----------|--------------------------------------|----------|-----------|------|
| 08/17/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 |
| 09/01/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 |
| 09/12/17 | Call with K. Maclay re: case status | EHARR | B001 | 0.10 |
| 09/14/17 | Download and circulate new pleadings | CCATH | B001 | 0.20 |
| 09/19/17 | Email to J. Dayton re: case status | SKOHU | B001 | 0.10 |
| 09/25/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 |
| Sub Total | | | | 0.70 |

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 07/18/17 | Call to L. Fitzpatrick, call from Caplin & Drysdale, and call to S. Kohut re: engagement motion and retention issues | EHARR | B017 | 0.40 |
| 07/18/17 | Emails with E. Harron re: preparing retention documents | SKOHU | B017 | 0.10 |
| 07/18/17 | Analyze Szekelyi declaration and committee counsel retention application | SKOHU | B017 | 0.50 |
| 07/19/17 | Prepare YCST retention application | CCATH | B017 | 1.30 |
| 07/19/17 | Work on preparing pro hac vice motion for E. Harron | CCATH | B017 | 0.50 |
| 07/19/17 | Work on YCST retention application | SKOHU | B017 | 1.10 |
| 07/19/17 | Review and revise draft YCST retention application | SKOHU | B017 | 0.40 |
| 07/19/17 | Review and revise draft motion to appoint FCR | SKOHU | B017 | 0.50 |
| 07/19/17 | Analyze N.D. Ohio local rules; emails with E. Harron re: potential Ohio counsel options | SKOHU | B017 | 0.50 |
| 07/19/17 | Further review and revise draft YCST retention application | SKOHU | B017 | 0.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40406967

10-12-2017

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 07/20/17 | Work on preparing pro hac vice motion for E. Harron | CCATH | B017 | 0.20 |
| 07/20/17 | Prepare Fitzpatrick declaration in support of appointment | CCATH | B017 | 0.90 |
| 07/20/17 | Prepare notice and proposed order to Fitzpatrick appointment motion | CCATH | B017 | 0.80 |
| 07/20/17 | Review draft YCST and Fitzpatrick retention applications and provide comments to same | EHARR | B017 | 0.50 |
| 07/20/17 | Continue to review and revise FCR and YCST retention papers | SKOHU | B017 | 0.80 |
| 07/21/17 | Correspondence with L. Fitzpatrick re: FCR retention papers | SKOHU | B017 | 0.10 |
| 07/21/17 | Review and revise FCR and YCST retention papers | SKOHU | B017 | 0.80 |
| 07/25/17 | Correspondence with E. Harron and TAC counsel re: FCR retention papers (.1); research Ohio counsel options (.1) | SKOHU | B017 | 0.50 |
| 07/31/17 | Email from L. Fitzpatrick re: FCR retention disclosures | SKOHU | B017 | 0.10 |
| 08/04/17 | Review and revise FCR retention papers per comments of Debtor and ACC (1.3); multiple emails with K. Davis, E. Harron and L. Fitzpatrick re: status and strategy for same (.5) | SKOHU | B017 | 1.80 |
| 08/04/17 | Emails with K. Davis and E. Harron re: FCR retention papers | SKOHU | B017 | 0.10 |
| 08/05/17 | Edit FCR appointment papers | EHARR | B017 | 0.30 |
| 08/06/17 | Emails with E. Harron re: strategy for FCR appointment and counsel retention; analyze disclosures needed for same | SKOHU | B017 | 0.30 |
| 08/07/17 | Emails with E. Harron re: strategy for FCR retention disclosures | SKOHU | B017 | 0.10 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40406967

10-12-2017

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 08/07/17 | Review and revise FCR declaration and retention papers (.7); multiple correspondence with L. Fitzpatrick and E. Harron re: same (.1); email to K. Davis re: revisions to same (.1) | SKOHU | B017 | 0.90 |
| 08/07/17 | Review and revise YCST retention application; emails with E. Harron re: same | SKOHU | B017 | 0.40 |
| 08/09/17 | Confer with S. Kohut and D. Laskin re: filing logistics and timing | CCATH | B017 | 0.20 |
| 08/09/17 | Correspondence with K. Davis re: Fitzpatrick declaration for FCR appointment motion; review and revise Fitzpatrick declaration; correspondence with L. Fitzpatrick re: same | SKOHU | B017 | 0.50 |
| 08/09/17 | Finalize Fitzpatrick declaration for motion to appoint FCR; correspondence with K. Davis re: same | SKOHU | B017 | 0.30 |
| 08/11/17 | Confer with S. Kohut re: filing status of FCR motion | CCATH | B017 | 0.10 |
| 08/11/17 | Email with E. Harron re: timing for retention application | SKOHU | B017 | 0.10 |
| 08/14/17 | Emails with E. Harron re: status of FCR appointment motion and potential Ohio counsel | SKOHU | B017 | 0.20 |
| 08/15/17 | Correspondence with K. Davis re: status of FCR appointment motion | SKOHU | B017 | 0.20 |
| 08/16/17 | Confer with S. Kohut re: FCR motion papers | CCATH | B017 | 0.10 |
| 08/16/17 | Respond to U.S. Trustee issues re: terms of FCR order | EHARR | B017 | 0.20 |
| 08/16/17 | Research re: Ohio counsel options | SKOHU | B017 | 0.10 |
| 08/16/17 | Meet with E. Harron re: Ohio counsel; call to potential counsel re: same | SKOHU | B017 | 0.20 |
| 08/16/17 | Email to K. Davis re: retention of Ohio counsel | SKOHU | B017 | 0.10 |
| 08/16/17 | Prepare responses to U.S. Trustee comments on proposed FCR appointment papers; emails with E. Harron and L. Fitzpatrick re: strategy for same | SKOHU | B017 | 0.80 |

01:22446865.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40406967

10-12-2017

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 08/17/17 | Follow-up emails re: U.S. Trustee questions to FCR application | EHARR | B017 | 0.10 |
| 08/17/17 | Emails with L. Fitzpatrick, E. Harron, and K. Maclay re: responses to comments of U.S. Trustee; finalize responses to same | SKOHU | B017 | 0.50 |
| 08/18/17 | Research re: fee application procedures | CCATH | B017 | 0.30 |
| 08/18/17 | Review motion filed to appoint FCR | SKOHU | B017 | 0.20 |
| 08/18/17 | Emails with C. Cathcart re: compensation procedures order | SKOHU | B017 | 0.10 |
| 08/21/17 | Emails with K. Maclay and with client re: U.S. Trustee's edits to FCR retention motion | EHARR | B017 | 0.30 |
| 08/21/17 | Email to L. Fitzpatrick re: FCR insurance | EHARR | B017 | 0.10 |
| 08/22/17 | Correspondence with C. Cathcart re: information related to L. Fitzpatrick's E&O policy | SZIEG | B017 | 0.10 |
| 08/28/17 | Correspondence with E. Harron re: status of Ohio counsel retention | SKOHU | B017 | 0.10 |
| 08/28/17 | Correspondence to E. Harron re: status of L. Fitzpatrick's E&O policy | SZIEG | B017 | 0.10 |
| 08/29/17 | Correspondence with E. Harron re: Ohio counsel options | SKOHU | B017 | 0.20 |
| 08/30/17 | Meet with E. Harron re: Ohio counsel options; telephone calls re: same | SKOHU | B017 | 0.20 |
| 08/30/17 | Email to L. Fitzpatrick re: status of Ohio counsel retention | SKOHU | B017 | 0.10 |
| 08/31/17 | Review and revise YCST retention application; email to J. Dayton re: same | SKOHU | B017 | 0.40 |
| 09/08/17 | Update E. Harron's pro hac vice motion, prepare S. Kohut's pro hac vice motion, and update YCST's retention application | CCATH | B017 | 0.60 |
| 09/08/17 | Analyze correspondence from J. Dayton re: retention applications and compensation procedures | SKOHU | B017 | 0.20 |

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YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40406967

10-12-2017

| Date | Description | Attorney | Task Code | Time |
|----------|---|----------|-----------|------|
| 09/11/17 | Edit YCST retention papers (.3) and review edits to Ohio FCR counsel application (.3) | EHARR | B017 | 0.60 |
| 09/11/17 | Correspondence from J. Dayton re: Ohio counsel retention | SKOHU | B017 | 0.10 |
| 09/11/17 | Analyze, review and revise draft retention application for Black McCuskey (.6); review and revise draft retention application for YCST (.6) | SKOHU | B017 | 1.20 |
| 09/11/17 | Multiple emails with E. Harron and L. Fitzpatrick re: retention applications for YCST and Black McCuskey | SKOHU | B017 | 0.30 |
| 09/12/17 | Email to J. Dayton re: YCST and BMSA retention applications | SKOHU | B017 | 0.40 |
| 09/12/17 | Emails with E. Harron and J. Dayton re: FCR appointment and timing to file YCST and BMSA retention applications | SKOHU | B017 | 0.20 |
| 09/13/17 | Research for YCST retention application | CCATH | B017 | 0.20 |
| 09/13/17 | Emails re: FCR order and potential need for correction | EHARR | B017 | 0.20 |
| 09/13/17 | Emails with J. Dayton, E. Harron, and C. Cathcart re: FCR appointment order and retention apps of YCST and BMSA | SKOHU | B017 | 0.20 |
| 09/13/17 | Analyze proposed FCR appointment order against entered order (3); analyze strategy for correcting entered order (.2); emails with E. Harron re: same (.2); multiple correspondence with J. Dayton re: correction of FCR appointment order | SKOHU | B017 | 1.30 |
| 09/13/17 | Correspondence with L. Fitzpatrick and E. Harron re: FCR retention related issues (.1); correspondence with J. Bolan and C. Cathcart re: same (.2) | SZIEG | B017 | 0.30 |
| 09/14/17 | Revise FCR appointment order per S. Kohut's instructions | CCATH | B017 | 0.20 |
| 09/14/17 | Multiple correspondence with J. Dayton and E. Harron re: strategy for correcting FCR appointment order | SKOHU | B017 | 0.40 |

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YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40406967

10-12-2017

| Date | Description | Attorney | Task Code | Time |
|-----------|---|----------|-----------|-------|
| 09/18/17 | Analyze proposed revised FCR appointment order; email to J. Dayton re: same | SKOHU | B017 | 0.10 |
| 09/19/17 | Attend to issues re: FCR's insurance | CCATH | B017 | 0.20 |
| 09/20/17 | Confer with J. Forbes re: fee application procedures | CCATH | B017 | 0.10 |
| 09/21/17 | Attend to issues re: FCR's insurance | CCATH | B017 | 0.10 |
| 09/28/17 | Review interim compensation order | LEDEN | B017 | 0.20 |
| Sub Total | | | | 27.40 |

| Date | Description | Attorney | Task Code | Time |
|-----------|---|----------|-----------|------|
| 09/19/17 | Review and revise YCST fee statement for July and August 2017 | SKOHU | B018 | 0.30 |
| 09/28/17 | Draft template re: interim fee applications of YCST | LEDEN | B018 | 1.80 |
| Sub Total | | | | 2.10 |

EXHIBIT A-2

INVOICE FOR OCTOBER 1, 2017 – OCTOBER 31, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

(302) 571-6600
(800) 253-2234 (DE ONLY)

RODNEY SQUARE
1000 NORTH KING STREET
WILMINGTON, DELAWARE 19801

(302) 571-1253 FAX
www.ycst.com

P.O. BOX 391
WILMINGTON, DELAWARE 19899-0391

TAX I.D. No. 51-0082644

TO:

11/16/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40407836

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

| | | |
|----------------------|----|------------------------|
| Total Fees | \$ | 6,895.50 |
| Total Expenses | | <u>34.66</u> |
| Total | \$ | <u><u>6,930.16</u></u> |

WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. **076321.1001** AND SEND TO THE ATTENTION
OF ACCOUNTING DEPT.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

| <u>TASK CODE</u> | <u>TASK DESCRIPTION</u> | <u>TOTAL HOURS</u> | <u>TOTAL AMOUNT</u> |
|----------------------|---------------------------------------|------------------------|-------------------------|
| B001 | Case Administration | 0.70 | 298.00 |
| B011 | Other Adversary Proceedings | 2.20 | 1,189.50 |
| B012 | Plan and Disclosure Statement | 0.20 | 164.00 |
| B016 | Asset Analysis | 8.90 | 4,338.50 |
| B017 | Retention of Professionals/Fee Issues | 2.40 | 905.50 |
| Totals | | 14.40 | \$ 6,895.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

| Task B001 | | Total | | Hourly | | |
|----------------------------|-----------|--------------|------|---------------|----|--------------|
| Case Administration | | Hours | | Rate | | Total |
| Casey Cathcart | Paralegal | 0.20 | x \$ | 240.00 | = | 48.00 |
| Edwin J. Harron | Partner | 0.10 | x \$ | 820.00 | = | 82.00 |
| Jordan E. Sazant | Associate | 0.20 | x \$ | 285.00 | = | 57.00 |
| Sara Beth A.R. Kohut | Counsel | 0.20 | x \$ | 555.00 | = | 111.00 |
| Totals: | | 0.70 | | | \$ | 298.00 |

| Task B011 | | Total | | Hourly | | |
|------------------------------------|-----------|--------------|------|---------------|----|--------------|
| Other Adversary Proceedings | | Hours | | Rate | | Total |
| Casey Cathcart | Paralegal | 0.10 | x \$ | 240.00 | = | 24.00 |
| Sara Beth A.R. Kohut | Counsel | 2.10 | x \$ | 555.00 | = | 1,165.50 |
| Totals: | | 2.20 | | | \$ | 1,189.50 |

| Task B012 | | Total | | Hourly | | |
|--------------------------------------|---------|--------------|------|---------------|----|--------------|
| Plan and Disclosure Statement | | Hours | | Rate | | Total |
| Edwin J. Harron | Partner | 0.20 | x \$ | 820.00 | = | 164.00 |
| Totals: | | 0.20 | | | \$ | 164.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

| Task B016 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|-----------------------|-----------|--------------|------|---------------|----|--------------|
| Asset Analysis | | <u>Hours</u> | | <u>Rate</u> | | |
| Edwin J. Harron | Partner | 1.40 | x \$ | 820.00 | = | 1,148.00 |
| Jordan E. Sazant | Associate | 3.60 | x \$ | 285.00 | = | 1,026.00 |
| Sara Beth A.R. Kohut | Counsel | 3.90 | x \$ | 555.00 | = | 2,164.50 |
| Totals: | | 8.90 | | | \$ | 4,338.50 |

| Task B017 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|--|-----------|--------------|------|---------------|----|--------------|
| Retention of Professionals/Fee Issues | | <u>Hours</u> | | <u>Rate</u> | | |
| Casey Cathcart | Paralegal | 1.70 | x \$ | 240.00 | = | 408.00 |
| Edwin J. Harron | Partner | 0.20 | x \$ | 820.00 | = | 164.00 |
| Sara Beth A.R. Kohut | Counsel | 0.10 | x \$ | 555.00 | = | 55.50 |
| Sharon M. Zieg | Partner | 0.40 | x \$ | 695.00 | = | 278.00 |
| Totals: | | 2.40 | | | \$ | 905.50 |

Aggregate Total: 14.40 \$ 6,895.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

| | | <u>Total Hours</u> | | <u>Hourly Rate</u> | | <u>Total</u> |
|--------|-------------------------------|------------------------|----|------------------------|----|--------------|
| EHARR | Edwin J. Harron, Partner | 1.90 | \$ | 820.00 | = | 1,558.00 |
| SZIEG | Sharon M. Zieg, Partner | 0.40 | \$ | 695.00 | = | 278.00 |
| SKOHU | Sara Beth A.R. Kohut, Counsel | 6.30 | \$ | 555.00 | = | 3,496.50 |
| JSAZA | Jordan E. Sazant, Associate | 3.80 | \$ | 285.00 | = | 1,083.00 |
| CCATH | Casey Cathcart, Paralegal | 2.00 | \$ | 240.00 | = | 480.00 |
| Total: | | 14.40 | | | \$ | 6,895.50 |

TIME DETAIL GROUPED BY TASK CODE

| Date | Description | Attorney | Task Code | Time |
|-----------|---|----------|-----------|------|
| 10/05/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 |
| 10/12/17 | Call with L. Fitzpatrick re: case status | EHARR | B001 | 0.10 |
| 10/12/17 | Telephone call with K. Davis re: meeting to discuss case strategy and due diligence | SKOHU | B001 | 0.10 |
| 10/12/17 | Email to E. Harron re: due diligence strategy | SKOHU | B001 | 0.10 |
| 10/17/17 | Emails with S. Kohut (x3) re: insurance settlement agreement review | JSAZA | B001 | 0.10 |
| 10/18/17 | Emails (x2) with S. Kohut re: indemnity provision | JSAZA | B001 | 0.10 |
| 10/24/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 |
| Sub Total | | | | 0.70 |

| Date | Description | Attorney | Task Code | Time |
|-----------|---|----------|-----------|------|
| 10/27/17 | Analyze correspondence from K. Davis re: protective order and motion to add FCR to same; email to L. Fitzpatrick and E. Harron re: same; draft confidentiality acknowledgement | SKOHU | B011 | 1.10 |
| 10/30/17 | Obtain protective orders for S. Kohut | CCATH | B011 | 0.10 |
| 10/30/17 | Analyze comments from J. Dayton re: motion to amend protective order and amended protective order (.1); review and revise markup of same (.6); revise letter to Debtor's counsel re: protective order (.1); email to L. Fitzpatrick re: same (.1); correspondence to K. Davis re: same (.1) | SKOHU | B011 | 1.00 |
| Sub Total | | | | 2.20 |

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 10/23/17 | Call with K. Maclay re: plan negotiation (.1); call to client re: case status (.1) | EHARR | B012 | 0.20 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40407836

11-16-2017

| Date | Description | Attorney | Task Code | Time |
|------|-------------|----------|-----------|------|
| | Sub Total | | | 0.20 |

| Date | Description | Attorney | Task Code | Time |
|----------|--|----------|-----------|------|
| 10/04/17 | Emails with K. Quinn and E. Harron re: insurance analysis | SKOHU | B016 | 0.10 |
| 10/09/17 | Call with S.B. Kohut and K. Quinn re: insurance overview | EHARR | B016 | 0.40 |
| 10/09/17 | Telephone call with E. Harron, K. Quinn and D. Wolf re: insurance asset analysis and case strategy; analyze materials from K. Quinn re: same | SKOHU | B016 | 0.40 |
| 10/09/17 | Draft correspondence to L. Fitzpatrick re: analysis of insurance assets and strategy for same | SKOHU | B016 | 0.50 |
| 10/12/17 | Analyze draft insurance settlement agreement and draft QSF motion | SKOHU | B016 | 1.00 |
| 10/17/17 | Meet with S. Kohut re: settlement agreement review and comparison assignment | JSAZA | B016 | 0.20 |
| 10/17/17 | Correspondence with J. Sazant re: project to analyze proposed insurance settlements | SKOHU | B016 | 0.20 |
| 10/17/17 | Correspondence with D. Wolf re: proposed insurance settlement; correspondence with L. Fitzpatrick re: same | SKOHU | B016 | 0.20 |
| 10/18/17 | Review Hartford settlement and QSF motion | EHARR | B016 | 0.60 |
| 10/18/17 | Review Hartford settlement agreement | JSAZA | B016 | 2.20 |
| 10/18/17 | Review QSF motion | JSAZA | B016 | 1.10 |
| 10/18/17 | Email to S. Kohut re: settlement agreement markup and QSF motion | JSAZA | B016 | 0.10 |
| 10/19/17 | Review edits to Hartford settlement and QSF motion | EHARR | B016 | 0.40 |
| 10/19/17 | Analyze J. Sazant comments on draft insurance settlement agreement; review and revise same and draft QSF motion | SKOHU | B016 | 0.80 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40407836

11-16-2017

| Date | Description | Attorney | Task Code | Time |
|-----------|---|----------|-----------|------|
| 10/19/17 | Further review and revise draft insurer settlement agreement and QSF motion | SKOHU | B016 | 0.50 |
| 10/19/17 | Correspondence with E. Harron and Gilbert re: insurance settlement agreement and QSF motion | SKOHU | B016 | 0.20 |
| Sub Total | | | | 8.90 |

| Date | Description | Attorney | Task Code | Time |
|-----------|--|----------|-----------|------|
| 10/02/17 | Email to J. Dayton re: retention status | SKOHU | B017 | 0.10 |
| 10/27/17 | Attend to issues re: FCR's insurance | CCATH | B017 | 1.70 |
| 10/30/17 | Review emails re: Fitzpatrick insurance | EHARR | B017 | 0.20 |
| 10/30/17 | Review correspondence; draft correspondence re: L. Fitzpatrick insurance | SZIEG | B017 | 0.40 |
| Sub Total | | | | 2.40 |

EXHIBIT A-3

INVOICE FOR NOVEMBER 1, 2017 – NOVEMBER 30, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

(302) 571-6600
(800) 253-2234 (DE ONLY)

RODNEY SQUARE
1000 NORTH KING STREET
WILMINGTON, DELAWARE 19801

(302) 571-1253 FAX
www.ycst.com

P.O. BOX 391
WILMINGTON, DELAWARE 19899-0391

TAX I.D. No. 51-0082644

TO:

12/19/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40408581

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

| | | |
|----------------------|----|-----------------|
| Total Fees | \$ | 7,627.50 |
| Total Expenses | | <u>320.57</u> |
| Total | \$ | <u>7,948.07</u> |

WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. **076321.1001** AND SEND TO THE ATTENTION
OF ACCOUNTING DEPT.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

| <u>TASK CODE</u> | <u>TASK DESCRIPTION</u> | <u>TOTAL HOURS</u> | <u>TOTAL AMOUNT</u> |
|----------------------|---|------------------------|-------------------------|
| B001 | Case Administration | 0.50 | 120.00 |
| B002 | Court Hearings | 1.00 | 704.00 |
| B006 | Use, Sale or Lease of Property (363 issues) | 3.90 | 2,350.00 |
| B012 | Plan and Disclosure Statement | 2.00 | 1,587.00 |
| B017 | Retention of Professionals/Fee Issues | 2.00 | 861.50 |
| B018 | Fee Application Preparation | 2.20 | 775.00 |
| B019 | Travel | 1.50 | 1,230.00 |
| Totals | | 13.10 | \$ 7,627.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

| Task B001 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|----------------------------|-----------|--------------|------|---------------|----|--------------|
| Case Administration | | <u>Hours</u> | | <u>Rate</u> | | |
| Casey Cathcart | Paralegal | 0.30 | x \$ | 240.00 | = | 72.00 |
| Lisa Eden | Paralegal | 0.20 | x \$ | 240.00 | = | 48.00 |
| Totals: | | 0.50 | | | \$ | 120.00 |

| Task B002 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|-----------------------|-----------|--------------|------|---------------|----|--------------|
| Court Hearings | | <u>Hours</u> | | <u>Rate</u> | | |
| Casey Cathcart | Paralegal | 0.20 | x \$ | 240.00 | = | 48.00 |
| Edwin J. Harron | Partner | 0.80 | x \$ | 820.00 | = | 656.00 |
| Totals: | | 1.00 | | | \$ | 704.00 |

| Task B006 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|--|---------|--------------|------|---------------|----|--------------|
| Use, Sale or Lease of Property (363 issues) | | <u>Hours</u> | | <u>Rate</u> | | |
| Edwin J. Harron | Partner | 0.70 | x \$ | 820.00 | = | 574.00 |
| Sara Beth A.R. Kohut | Counsel | 3.20 | x \$ | 555.00 | = | 1,776.00 |
| Totals: | | 3.90 | | | \$ | 2,350.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

| Task B012 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|--------------------------------------|---------|--------------|------|---------------|----|--------------|
| Plan and Disclosure Statement | | <u>Hours</u> | | <u>Rate</u> | | |
| Edwin J. Harron | Partner | 1.80 | x \$ | 820.00 | = | 1,476.00 |
| Sara Beth A.R. Kohut | Counsel | 0.20 | x \$ | 555.00 | = | 111.00 |
| Totals: | | 2.00 | | | \$ | 1,587.00 |

| Task B017 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|--|-----------|--------------|------|---------------|----|--------------|
| Retention of Professionals/Fee Issues | | <u>Hours</u> | | <u>Rate</u> | | |
| Lisa Eden | Paralegal | 1.10 | x \$ | 240.00 | = | 264.00 |
| Sara Beth A.R. Kohut | Counsel | 0.20 | x \$ | 555.00 | = | 111.00 |
| Sharon M. Zieg | Partner | 0.70 | x \$ | 695.00 | = | 486.50 |
| Totals: | | 2.00 | | | \$ | 861.50 |

| Task B018 | | <u>Total</u> | | <u>Hourly</u> | | <u>Total</u> |
|------------------------------------|-----------|--------------|------|---------------|----|--------------|
| Fee Application Preparation | | <u>Hours</u> | | <u>Rate</u> | | |
| Edwin J. Harron | Partner | 0.10 | x \$ | 820.00 | = | 82.00 |
| Lisa Eden | Paralegal | 1.50 | x \$ | 240.00 | = | 360.00 |
| Sara Beth A.R. Kohut | Counsel | 0.60 | x \$ | 555.00 | = | 333.00 |
| Totals: | | 2.20 | | | \$ | 775.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

| Task B019 Travel | | <u>Total Hours</u> | | <u>Hourly Rate</u> | | <u>Total</u> |
|-----------------------------|---------|------------------------|------|------------------------|----|--------------|
| Edwin J. Harron | Partner | 1.50 | x \$ | 820.00 | = | 1,230.00 |
| Totals: | | 1.50 | | | \$ | 1,230.00 |
| Aggregate Total: | | 13.10 | | | \$ | 7,627.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

| | | <u>Total Hours</u> | | <u>Hourly Rate</u> | | <u>Total</u> |
|--------|-------------------------------|------------------------|----|------------------------|----|--------------|
| EHARR | Edwin J. Harron, Partner | 4.90 | \$ | 820.00 | = | 4,018.00 |
| SZIEG | Sharon M. Zieg, Partner | 0.70 | \$ | 695.00 | = | 486.50 |
| SKOHU | Sara Beth A.R. Kohut, Counsel | 4.20 | \$ | 555.00 | = | 2,331.00 |
| CCATH | Casey Cathcart, Paralegal | 0.50 | \$ | 240.00 | = | 120.00 |
| LEDEN | Lisa Eden, Paralegal | 2.80 | \$ | 240.00 | = | 672.00 |
| Total: | | 13.10 | | | \$ | 7,627.50 |

TIME DETAIL GROUPED BY TASK CODE

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|--------------------------------------|----------|-----------|------|--------|
| 11/14/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 | 24.00 |
| 11/21/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 | 24.00 |
| 11/22/17 | Download and circulate new pleadings | CCATH | B001 | 0.10 | 24.00 |
| 11/28/17 | Update critical dates | LEDEN | B001 | 0.20 | 48.00 |
| Sub Total | | | | 0.50 | 120.00 |

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|--|----------|-----------|------|--------|
| 11/03/17 | Call to court re: E. Harron's telephonic appearance at 11/7/17 hearing | CCATH | B002 | 0.10 | 24.00 |
| 11/06/17 | Follow-up call to court re: E. Harron's telephonic appearance at 11/7/17 hearing | CCATH | B002 | 0.10 | 24.00 |
| 11/07/17 | Attend telephonic hearing/status conference | EHARR | B002 | 0.80 | 656.00 |
| Sub Total | | | | 1.00 | 704.00 |

| Date | Description | Attorney | Task Code | Time | Fees |
|----------|---|----------|-----------|------|--------|
| 11/08/17 | Analyze draft motion to approve insurance settlement | SKOHU | B006 | 0.70 | 388.50 |
| 11/09/17 | Review edits to Hartford settlement motion | EHARR | B006 | 0.10 | 82.00 |
| 11/09/17 | Emails with E. Harron and L. Fitzpatrick re: draft motion to approve Hartford settlement | SKOHU | B006 | 0.10 | 55.50 |
| 11/10/17 | Emails with L. Fitzpatrick and D. Wolf re: draft motion to approve settlement | SKOHU | B006 | 0.20 | 111.00 |
| 11/12/17 | Analyze revisions to insurance settlement agreement and proposed order; research proposed QSF administrator | SKOHU | B006 | 0.40 | 222.00 |
| 11/15/17 | Email to L. Fitzpatrick re: QSF administrator | SKOHU | B006 | 0.10 | 55.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40408581

12-19-2017

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|---|----------|-----------|------|----------|
| 11/16/17 | Emails with D. Wolf re: insurance settlement approval | SKOHU | B006 | 0.20 | 111.00 |
| 11/17/17 | Analyze proposed notices of insurance settlements and correspondence re: QSF fund; email to L. Fitzpatrick re: same | SKOHU | B006 | 0.20 | 111.00 |
| 11/20/17 | Review edits to Hartford motion | EHARR | B006 | 0.10 | 82.00 |
| 11/20/17 | Analyze revised motion to approve Hartford settlement and FCR consent request for same | SKOHU | B006 | 0.50 | 277.50 |
| 11/20/17 | Telephone to D. Wolf re: QSF motion and motion to approve Hartford settlement | SKOHU | B006 | 0.10 | 55.50 |
| 11/20/17 | Emails with L. Fitzpatrick and D. Wolf re: motions to approve Hartford settlement and QSF fund | SKOHU | B006 | 0.20 | 111.00 |
| 11/21/17 | Calls and emails with committee counsel, debtor counsel, special insurance counsel, and J. Dayton re: Hartford motion for arbitration and Hartford settlement | EHARR | B006 | 0.30 | 246.00 |
| 11/21/17 | Multiple mails and teleconference with K. Quinn and counsel for Debtor and TAC re: Hartford settlement status and strategy | SKOHU | B006 | 0.50 | 277.50 |
| 11/28/17 | Emails and call re: Hartford | EHARR | B006 | 0.20 | 164.00 |
| Sub Total | | | | 3.90 | 2,350.00 |

| Date | Description | Attorney | Task Code | Time | Fees |
|----------|---|----------|-----------|------|----------|
| 11/02/17 | Meet with client re: preparation for meeting with committee re: case status and plan strategy | EHARR | B012 | 0.30 | 246.00 |
| 11/02/17 | Meet with committee and client re: case status and plan strategy | EHARR | B012 | 1.50 | 1,230.00 |
| 11/08/17 | Confer with E. Harron re: status and strategy for due diligence and insurance settlement motion | SKOHU | B012 | 0.10 | 55.50 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40408581

12-19-2017

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|---|----------|-----------|------|----------|
| 11/09/17 | Emails with counsel for Debtor and TAC re: motion to amend protective order | SKOHU | B012 | 0.10 | 55.50 |
| Sub Total | | | | 2.00 | 1,587.00 |

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|---|----------|-----------|------|--------|
| 11/03/17 | Correspondence with J. Bolan re: E&O policy premium | SZIEG | B017 | 0.30 | 208.50 |
| 11/06/17 | Address issues re: L. Fitzpatrick's E&O policies and U.S. Trustee's inquiries related to same | SZIEG | B017 | 0.40 | 278.00 |
| 11/26/17 | Analyze to finalize fee applications for L. Fitzpatrick and YCST | SKOHU | B017 | 0.10 | 55.50 |
| 11/28/17 | Email to/from L. Fitzpatrick re: first interim fee statement of for the period July-November 2017 | LEDEN | B017 | 0.10 | 24.00 |
| 11/29/17 | Analyze for privilege L. Fitzpatrick fee statement from 7/18/17 through 11/2017 | SKOHU | B017 | 0.10 | 55.50 |
| 11/30/17 | Draft first interim fee application of L. Fitzpatrick for the period July-November 2017 | LEDEN | B017 | 1.00 | 240.00 |
| Sub Total | | | | 2.00 | 861.50 |

| Date | Description | Attorney | Task Code | Time | Fees |
|----------|---|----------|-----------|------|--------|
| 11/13/17 | Review, revise, and finalize YCST October fee statement re: fee application preparation | EHARR | B018 | 0.10 | 82.00 |
| 11/21/17 | Update and revise draft of first interim fee statement of YCST; email same to S. Kohut | LEDEN | B018 | 1.00 | 240.00 |
| 11/27/17 | Review and revise draft form on interim fee application of YCST; correspondence with E. Harron and L. Eden re: same | SKOHU | B018 | 0.60 | 333.00 |

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40408581

12-19-2017

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|--|----------|-----------|------|--------|
| 11/28/17 | Review, update, and revise draft first interim fee statement of YCST for the period July-November 2017 | LEDEN | B018 | 0.50 | 120.00 |
| Sub Total | | | | 2.20 | 775.00 |

| Date | Description | Attorney | Task Code | Time | Fees |
|-----------|---|----------|-----------|------|----------|
| 11/02/17 | Non-working travel (round trip) to Washington, DC re: meeting with committee (billed at 1/2 time) | EHARR | B019 | 1.50 | 1,230.00 |
| Sub Total | | | | 1.50 | 1,230.00 |

EXHIBIT B

**CUMULATIVE SUMMARY OF INTERIM APPLICATIONS OF YOUNG
CONAWAY STARGATT & TAYLOR, LLP, FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO FUTURE
CLAIMANTS' REPRESENTATIVE OF SEPCO CORPORATION
FOR THE PERIOD JULY 18, 2017 THROUGH NOVEMBER 30, 2017¹**

| <u>Matter Number</u> | <u>Matter Description</u> | Total Hours for the Period 7/18/2017- 11/30/2017 | Total Hours from the Petition Date | Total Fees for the Period 7/18/2017- 11/30/2017 | Total Fees from the Petition Date |
|---------------------------------|--|---|---|--|--|
| B001 | Case Administration | 1.90 | 1.90 | \$675.50 | \$675.50 |
| B002 | Court Hearings | 1.00 | 1.00 | \$704.00 | \$704.00 |
| B006 | Use, Sale or Lease of Property (363 issues) | 3.90 | 3.90 | \$2,350.00 | \$2,350.00 |
| B011 | Other Adversary Proceedings | 2.20 | 2.20 | \$1,189.50 | \$1,189.50 |
| B012 | Plan and Disclosure Statement | 2.20 | 2.20 | \$1,751.00 | \$1,751.00 |
| B016 | Asset Analysis | 8.90 | 8.90 | \$4,338.50 | \$4,338.50 |
| B017 | Retention of Professionals / Fee Issues | 31.80 | 31.80 | \$15,592.00 | \$15,592.00 |
| B018 | Fee Application Preparation | 4.30 | 4.30 | \$1,373.50 | \$1,373.50 |
| B019 | Travel | 1.50 | 1.50 | \$1,230.00 | \$1,230.00 |
| TOTAL | | 57.70 | 57.70 | \$29,204.00 | \$29,204.00 |

¹ See Footnote 2.

CUMULATIVE EXPENSE SUMMARY

| <u>Expense Category</u> | Total Expenses for the Period <u>7/18/2017-11/30/2017</u> | Total Expenses from the Petition Date |
|-----------------------------------|--|--|
| Air/Rail Travel | \$267.00 | \$267.00 |
| Car/Bus/Subway Travel | \$35.87 | \$35.87 |
| Certified Court Documents | \$0.00 | \$0.00 |
| Computerized Legal Research | \$0.00 | \$0.00 |
| Docket Retrieval/Search | \$47.50 | \$47.50 |
| Federal Express | \$15.26 | \$15.26 |
| Hotel/Lodging | \$0.00 | \$0.00 |
| Miscellaneous | \$0.00 | \$0.00 |
| Mileage | \$0.00 | \$0.00 |
| Parking | \$11.00 | \$11.00 |
| Postage | \$8.20 | \$8.20 |
| Reproduction Charges | \$22.10 | \$22.10 |
| Teleconference / Video Conference | \$0.00 | \$0.00 |
| Travel Meals | \$0.00 | \$0.00 |
| Working Meals | \$0.00 | \$0.00 |
| TOTAL | \$406.93 | \$406.93 |

EXHIBIT C-1

EXPENSES FOR JULY 18, 2017 – SEPTEMBER 30, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

| Description | Amount |
|---------------------------|---------------|
| Reproduction Charges | 20.40 |
| Docket Retrieval / Search | 31.30 |
| Total Disbursements: | \$51.70 |

CONTROL: 854519

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 319933

Page 14 (14)
RUN: 10/06/17
TIME: 11:28:54

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

| <u>UNBILLED EXPENSES</u> | | MATTER: 076321.1001 Debtor: Sepco Corporation | | | | | | | | | | | | | | |
|--------------------------|-------------|---|----------------|----------------|-------------|--|---------------------------|--------------------------|--------------------------|----------------|---------------|------------|------------|----------|----------|------------|
| <u>EXPENSE</u> | | | | | | | | | | | | | | | | |
| <u>DATE</u> | <u>CODE</u> | <u>INDEX NO.</u> | <u>CHECK #</u> | <u>INVOICE</u> | <u>ORIG</u> | <u>DESCRIPTION</u> | <u>RECORDED VALUE</u> | <u>BILLING VALUE</u> | <u>REVISED VALUE</u> | <u>CURRENT</u> | <u>STATUS</u> | <u>BNC</u> | <u>B/O</u> | <u>H</u> | <u>X</u> | <u>BNP</u> |
| 07/19/17 | S102 | 5186523 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 3.80 | 3.80 | | B | | | | | | |
| 07/20/17 | S102 | 5186524 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 1.30 | 1.30 | | B | | | | | | |
| 08/09/17 | S001 | 5175951 | | | JFORB | Photocopy Charges | 8.40 | 4.20 | | B | | | | | | |

CONTROL: 854519

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 319933

Page 15 (15)
RUN: 10/06/17
TIME: 11:28:55

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSES (Continued)

| DATE | EXPENSE CODE | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | RECORDED VALUE | BILLING VALUE | REVISED VALUE | ----- CURRENT | STATUS BNC B/O H X BNP |
|----------|--------------|-----------|---------|---------|------|--|----------------|---------------|---------------|------------------|---------------------------|
| | | | | | | Duplication BW 2019 Motions 0541 | | | | | |
| 08/11/17 | S102 | | | | | VENDOR NAME: 5201524 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.40 | 0.40 | | B | |
| 08/15/17 | S102 | | | | | VENDOR NAME: 5201525 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.20 | 0.20 | | B | |
| 08/16/17 | S102 | | | | | VENDOR NAME: 5201501 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.20 | 0.20 | | B | |
| 08/17/17 | S102 | | | | | VENDOR NAME: 5201502 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 6.50 | 6.50 | | B | |
| 08/18/17 | S102 | | | | | VENDOR NAME: 5201503 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 17.30 | 17.30 | | B | |
| 08/22/17 | S102 | | | | | VENDOR NAME: 5201504 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 1.40 | 1.40 | | B | |
| 08/23/17 | S102 | | | | | VENDOR NAME: 5201505 CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.20 | 0.20 | | B | |
| 08/31/17 | S001 | | | | | VENDOR NAME: 5186803 SKOHUPhotocopy Charges Duplication BW 0592 | 5.60 | 2.80 | | B | |
| 09/11/17 | S001 | | | | | VENDOR NAME: 5190185 SKOHUPhotocopy Charges Duplication BW 0592 | 5.60 | 2.80 | | B | |
| 09/11/17 | S001 | | | | | VENDOR NAME: 5190186 SKOHUPhotocopy Charges | 4.40 | 2.20 | | B | |

Page 16 (16)
RUN: 10/06/17
TIME: 11:28:55

EXHIBIT C-2

EXPENSES FOR OCTOBER 1, 2017 – OCTOBER 31, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

| Description | Amount |
|---------------------------|---------------|
| Reproduction Charges | 8.20 |
| Federal Express | 15.26 |
| Docket Retrieval / Search | 11.20 |
| Total Disbursements: | \$34.66 |

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 322937

Page 11 (11)
RUN: 11/09/17
TIME: 08:55:07

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSE DETAILS THROUGH 10/31/2017

| UNBILLED EXPENSES | | MATTER: 076321.1001 | | Debtor: Sepco Corporation | | | | | | | | | | | | | |
|-------------------|------|---------------------|---------|---------------------------|-------|--|-------------------|------------------|------------------|---------|-----|-----|---|---|-----|--|--|
| DATE | CODE | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | RECORDED VALUE | BILLING VALUE | REVISED VALUE | CURRENT | BNC | B/0 | H | X | BNP | | |
| 09/01/17 | S102 | 5216140 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.60 | 0.60 | | B | | | | | | | |
| 09/07/17 | S102 | 5216141 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.20 | 0.20 | | B | | | | | | | |
| 09/12/17 | S102 | 5216142 | | | CCATH | Docket Retrieval | 1.40 | 1.40 | | B | | | | | | | |

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 322937

Page 12 (12)
RUN: 11/09/17
TIME: 08:55:08

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSES

(Continued)

| EXPENSE | | (continued) | | | | | RECORDED | BILLING | REVISED | STATUS | | | | | |
|----------|------|---|---------|---------|-------|---|----------|---------|---------|---------|-----|-----|---|---|-----|
| DATE | CODE | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | VALUE | VALUE | VALUE | CURRENT | BNC | B/O | H | X | BNP |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 09/13/17 | S102 | VENDOR NAME: 5216143 | | | CCATH | Docket Retrieval | 1.20 | 1.20 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 09/14/17 | S102 | VENDOR NAME: 5216144 | | | CCATH | Docket Retrieval | 6.70 | 6.70 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 09/15/17 | S102 | VENDOR NAME: 5216145 | | | CCATH | Docket Retrieval | 0.20 | 0.20 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 09/18/17 | S102 | VENDOR NAME: 5216146 | | | CCATH | Docket Retrieval | 0.60 | 0.60 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 09/29/17 | S102 | VENDOR NAME: 5216147 | | | CCATH | Docket Retrieval | 0.30 | 0.30 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 10/12/17 | S001 | VENDOR NAME: 5205861 | | | SKOHU | Photocopy Charges Duplication BW 0592 | 3.00 | 1.50 | | B | | | | | |
| 10/12/17 | S001 | VENDOR NAME: 5205862 | | | PMORE | Photocopy Charges Duplication BW 0572 | 5.80 | 2.90 | | B | | | | | |
| 10/27/17 | 004 | VENDOR NAME: 5218522 201865 | | | CCATH | Federal Express -- FEDERAL EXPRESS - JEFFREY C. TOOLE, ESQ. CLEVELAND, OH | 15.26 | 15.26 | | B | | | | | |
| 10/30/17 | S001 | VENDOR NAME: Federal Express Corporation 5214115 | | | SKOHU | Photocopy Charges Duplication BW 0592 | 3.00 | 1.50 | | B | | | | | |
| | | | | | | VENDOR NAME: | | | | | | | | | |

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 322937

Page 13 (13)
RUN: 11/09/17
TIME: 08:55:08

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSES (Continued)

| DATE | EXPENSE CODE | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | RECORDED VALUE | BILLING VALUE | REVISED VALUE | ----- CURRENT | STATUS BNC B/O H X BNP |
|---|--------------|--------------|---------|---------|-------|---|----------------|---------------|---------------|------------------|---------------------------|
| 10/30/17 | S001 | 5214116 | | | SKOHU | Photocopy Charges Duplication BW 0592 | 1.20 | 0.60 | | B | ----- |
| | | VENDOR NAME: | | | | | | | | | |
| 10/30/17 | S001 | 5214117 | | | SKOHU | Photocopy Charges Duplication BW 0592 | 3.00 | 1.50 | | B | ----- |
| | | VENDOR NAME: | | | | | | | | | |
| 10/30/17 | S001SCN | 5214118 | | | PMORE | Scanning Charges 0572 | 0.20 | 0.10 | | B | ----- |
| | | VENDOR NAME: | | | | | | | | | |
| 10/30/17 | S001SCN | 5214119 | | | PMORE | Scanning Charges 0572 | 0.20 | 0.10 | | B | ----- |
| | | VENDOR NAME: | | | | | | | | | |
| INCLUDED EXPENSES FOR MATTER: 076321.1001 | | | | | | | 42.86 | 34.66 | | | |
| EXCLUDED EXPENSES (Expenses on Hold) | | | | | | | 0.00 | 0.00 | | | |
| EXPENSES AFTER CUTOFF DATE | | | | | | | | 294.87 | | | |

STATUS CODE LEGEND

| | | | | | |
|-----|--------------------------------|---|----------------------------|-----|------------------------------------|
| B | Billable | H | Expense on Hold (Excluded) | NB | Non-Billable |
| BNC | Bill - No Charge | X | Excluded from Instruction | BNP | Expense will not show on Statement |
| B/O | Billable - reduce value to "0" | | | | |

EXPENSE CODE SUMMARY

| EXPENSE CODE | DESCRIPTION | RECORDED VALUE | BILLING VALUE |
|--|---------------------------|----------------|---------------|
| 004 | Federal Express | 15.26 | 15.26 |
| S001 | Photocopy Charges | 16.00 | 8.00 |
| S001SCN | Scanning Charges | 0.40 | 0.20 |
| S102 | Docket Retrieval / Search | 11.20 | 11.20 |
| EXPENSE TOTAL | | 42.86 | 34.66 |
| TOTAL EXPENSES FOR INSTRUCTION: 322937 | | 42.86 | 34.66 |

BILL HISTORY

| BILL NUMBER | DATE | FEES | BILLED EXPENSES | ON-ACCOUNT | CASH RECEIVED | LAST PAY DATE | RECEIVABLE WRITTEN-OFF | OUTSTANDING BALANCE |
|-------------|----------|-----------|-----------------|------------|---------------|---------------|------------------------|---------------------|
| 40406967 | 10/12/17 | 14,681.00 | 51.70 | 0.00 | 0.00 | | 0.00 | 14,732.70 |

EXHIBIT C-3

EXPENSES FOR NOVEMBER 1, 2017 – NOVEMBER 30, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

| Description | Amount |
|---------------------------|---------------|
| Reproduction Charges | 1.70 |
| Air/Rail Travel | 267.00 |
| Parking | 11.00 |
| Car/Bus/Subway Travel | 35.87 |
| Docket Retrieval / Search | 5.00 |
| Total Disbursements: | \$320.57 |

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 324658

Page 11 (11)
RUN: 12/14/17
TIME: 08:41:38

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

| DATE | EXPENSE CODE | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | RECORDED VALUE | BILLING VALUE | REVISED VALUE | CURRENT | STATUS | BNC | B/O | H | X | BNP |
|----------|--------------|-----------|---------|---------|-------|---|----------------|---------------|---------------|---------|--------|-----|-----|---|---|-----|
| 10/02/17 | S102 | 5230627 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 0.60 | 0.60 | | B | | | | | | |
| 10/05/17 | S102 | 5230628 | | | CCATH | Docket Retrieval / Search - Payee: Pacer Service Center Pacer | 1.00 | 1.00 | | B | | | | | | |
| 10/18/17 | S102 | 5230629 | | | CCATH | Docket Retrieval | 0.20 | 0.20 | | B | | | | | | |

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 324658

Page 12 (12)
RUN: 12/14/17
TIME: 08:42:01

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSES (Continued)

| <u>EXPENSE</u> | | | | | | | | | | | <u>STATUS</u> | | | | |
|----------------|-------------|------------------|----------------|----------------|-------------|--|---------------------------------|--------------------------------|--------------------------------|--------------------------------|---------------|------------|----------|----------|------------|
| <u>DATE</u> | <u>CODE</u> | <u>INDEX NO.</u> | <u>CHECK #</u> | <u>INVOICE</u> | <u>ORIG</u> | <u>DESCRIPTION</u> | <u>RECORDED</u> <u>VALUE</u> | <u>BILLING</u> <u>VALUE</u> | <u>REVISED</u> <u>VALUE</u> | <u>-----</u> <u>CURRENT</u> | <u>BNC</u> | <u>B/O</u> | <u>H</u> | <u>X</u> | <u>BNP</u> |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 10/30/17 | S102 | | | | | VENDOR NAME: 5230630 CCATHDocket Retrieval | 3.20 | 3.20 | | B | | | | | |
| | | | | | | / Search - Payee: Pacer Service Center Pacer | | | | | | | | | |
| 11/08/17 | 027 | | | | | VENDOR NAME: 5218409 90100531 EHARRAir/Rail Travel - | 267.00 | 267.00 | | B | | | | | |
| | | | | | | Payee: Harron, Edwin J. * Train fare (round trip) for E. Harron to Washington, DC re: 11/2/17 meeting | | | | | | | | | |
| 11/08/17 | 086 | | | | | VENDOR NAME: Harron, Edwin J. 5218410 90100531 EHARRParking - Payee: | 11.00 | 11.00 | | B | | | | | |
| | | | | | | Harron, Edwin J. * Parking for E. Harron at Wilmington train station re: 11/2/17 meeting in Washington, DC | | | | | | | | | |
| 11/08/17 | 087 | | | | | VENDOR NAME: Harron, Edwin J. 5218411 90100531 EHARRCar/Bus/Subway | 16.87 | 16.87 | | B | | | | | |
| | | | | | | Travel - Payee: Harron, Edwin J. * Transportation for E. Harron in Washington, DC re: 11/2/17 meeting | | | | | | | | | |
| 11/08/17 | S001 | | | | | VENDOR NAME: Harron, Edwin J. 5219478 SKOHUPhotocopy Charges | 2.20 | 1.10 | | B | | | | | |
| | | | | | | Duplication BW 0592 | | | | | | | | | |
| 11/16/17 | 087 | | | | | VENDOR NAME: 5222493 90100645 EHARRCar/Bus/Subway | 19.00 | 19.00 | | B | | | | | |
| | | | | | | Travel - Payee: Harron, Edwin J. * Transportation for E. Harron and L. Fitzpatrick re: 11/2/17 | | | | | | | | | |

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 324658

Page 13 (13)
RUN: 12/14/17
TIME: 08:42:01

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants RepresentMATTER: 076321.1001 Debtor: Sepco Corporation

| UNBILLED EXPENSES | | | | | | | | | | (Continued) | | | | | |
|---|---------|-----------|---------|---------|------|--|----------|---------|---------|--------------------|-------|-------|-------|-------|-------|
| EXPENSE | | INDEX NO. | CHECK # | INVOICE | ORIG | DESCRIPTION | RECORDED | BILLING | REVISED | ----- STATUS ----- | | | | | |
| DATE | CODE | | | | | | VALUE | VALUE | VALUE | CURRENT | BNC | E/O | H | X | BNP |
| | | | | | | meeting in Washington, DC | | | | | | | | | |
| 11/22/17 | S001SCN | 5226066 | | | | VENDOR NAME: Harron, Edwin J. PMOREScanning Charges 0572 | 0.20 | 0.10 | _____ | B | _____ | _____ | _____ | _____ | _____ |
| 11/22/17 | S001SCN | 5226067 | | | | VENDOR NAME: PMOREScanning Charges 0572 | 0.20 | 0.10 | _____ | B | _____ | _____ | _____ | _____ | _____ |
| 11/30/17 | S001SCN | 5228901 | | | | VENDOR NAME: PMOREScanning Charges 0572 | 0.40 | 0.20 | _____ | B | _____ | _____ | _____ | _____ | _____ |
| 11/30/17 | S001SCN | 5228902 | | | | VENDOR NAME: PMOREScanning Charges 0572 | 0.40 | 0.20 | _____ | B | _____ | _____ | _____ | _____ | _____ |
| | | | | | | VENDOR NAME: | | | | | | | | | |
| INCLUDED EXPENSES FOR MATTER: 076321.1001 | | | | | | | 322.27 | 320.57 | | | | | | | |
| EXCLUDED EXPENSES (Expenses on Hold) | | | | | | | 0.00 | 0.00 | | | | | | | |
| EXPENSES AFTER CUTOFF DATE | | | | | | | | 15.30 | | | | | | | |

STATUS CODE LEGEND

| | | | | | |
|-----|--------------------------------|---|----------------------------|-----|------------------------------------|
| B | Billable | H | Expense on Hold (Excluded) | NB | Non-Billable |
| BNC | Bill - No Charge | X | Excluded from Instruction | BNP | Expense will not show on Statement |
| B/O | Billable - reduce value to "0" | | | | |

EXPENSE CODE SUMMARY

| EXPENSE CODE | DESCRIPTION | RECORDED VALUE | BILLING VALUE |
|--|---------------------------|----------------|---------------|
| 027 | Air/Rail Travel | 267.00 | 267.00 |
| 086 | Parking | 11.00 | 11.00 |
| 087 | Car/Bus/Subway Travel | 35.87 | 35.87 |
| S001 | Photocopy Charges | 2.20 | 1.10 |
| S001SCN | Scanning Charges | 1.20 | 0.60 |
| S102 | Docket Retrieval / Search | 5.00 | 5.00 |
| EXPENSE TOTAL | | 322.27 | 320.57 |
| TOTAL EXPENSES FOR INSTRUCTION: 324658 | | 322.27 | 320.57 |

BILL HISTORY

| BILL NUMBER | DATE | FEES | BILLED EXPENSES | ON-ACCOUNT | CASH RECEIVED | LAST PAY DATE | RECEIVABLE WRITTEN-OFF | OUTSTANDING BALANCE |
|-------------|------|------|-----------------|------------|---------------|---------------|------------------------|---------------------|
|-------------|------|------|-----------------|------------|---------------|---------------|------------------------|---------------------|

EXHIBIT D

CERTIFICATION OF EDWIN J. HARRON

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

CERTIFICATION OF EDWIN J. HARRON

EDWIN J. HARRON does hereby certify as follows:

1. I am a partner of Young Conaway Stargatt & Taylor, LLP (the “Applicant”), counsel to Lawrence Fitzpatrick, the legal representative for future asbestos claimants.
2. I am a professional who has performed services in this case and I have responsibility for compliance with Local Rule 2016-1 and the Guidelines for Compensation and Expense Reimbursement of Professionals.
3. I was admitted *pro hac vice* to this Court on September 14, 2017 [D.I. 273].
4. I have read the foregoing Application and the information therein is true to the best of my knowledge, information, and belief.
5. The Applicant has received no promises for payment from any third party for services rendered in connection with the case for the Interim Period (commencing July 18, 2017 through November 30, 2017²). There exists no agreement or understanding between the Applicant and

¹ The last four digits of the Debtor’s federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants’ Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor (“YCST”). YCST’s next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the “Interim Compensation Order”) which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

any other person for the sharing of any compensation to be received for services rendered by the Applicant in the case.

6. To the best of my knowledge, information, and belief, the compensation and expense reimbursement requested in the Application has been billed at the standard billing rates and in accordance with the practices customarily employed by the Applicant.

Dated: December 21, 2017

/s/ Edwin J. Harron

Edwin J. Harron